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Submitted online at:
<http://tinyurl.com/nl5jx3a> and via e-mail to:

Brenda Ehmann – Sequoia National Forest Planner
Mike Dietl – Region 5 Plan Revision Project Manager

cc: Ara Marderosian
Alison Sheehy
Joe Fontaine, Kevin Elliott
Stephen Montgomery

Subject:

1. Comments regarding the September 2015 “Wilderness Evaluation Process and Process for Identifying Areas for Potential Wilderness Recommendation during Environmental Analysis” for the Sequoia National Forest Plan Revision
2. Specific Potential Wilderness Areas that we believe should be moved forward as Recommended for Wilderness in the Sequoia National Forest and Giant Sequoia National Monument

Sequoia ForestKeeper and the Kern-Kaweah Chapter of the Sierra Club provide the following comments with regard to Potential Wilderness Areas in the Sequoia National Forest.

We would also like to refer the agency to comments submitted by the coalition of environmental groups by letters on June 3, 2015 and August 28, 2015 (attached as Exhibits A & B). Our comments are in support of those comments and are intended as a supplement.

1. The Wilderness Evaluation Process should provide at least one additional formal public participation opportunity during the evaluation of inventoried areas and prior to release of the draft EIS.

With regard to the wilderness evaluation process, the Forest Service Handbook requires that “[t]he Responsible Official should provide opportunities for public and governmental participation when evaluating lands identified in the inventory.” FSH 1909.12, Chapter 72. We believe that this means that public participation should occur during the evaluation and not just after evaluations and narratives have been completed and areas have been put forward (or not) as part of alternative in the Draft EIS for the plan revision.

So far, the opportunities for public participation in evaluating the lands identified in the inventory have been few. In fact, we have only seen evaluations of the very few areas identified and put forward in the initial recommendations. The process should provide for at least one additional formal public involvement opportunity during the evaluations of identified lands and prior to any further screening or selection of areas for inclusion in alternatives in the Draft EIS. Moreover, the public should be able to provide formal input in response to the initial recommendations already released.

This is necessary to correct errors and assumptions made during the inventories, the evaluations, the narratives, and the initial recommendations. For example, the initial inventory maps for the

Sequoia National Forest included a significant error by omitting the Bright Star Wilderness on BLM lands, which is located directly adjacent to the Sequoia National Forest Boundary in the Piute Mountains. The area in Sequoia National Forest directly adjacent to the Bright Star Wilderness on the west side is a large contiguous potential Wilderness. Also, for example, the initial recommendation for the Domeland Wilderness Addition (West) states that the “western boundary is setback from trail 34E12” to offset the boundary from this motorized trail without acknowledging that the Kern River Ranger District and Sequoia National Forest have agreed and plan to permanently close this trail to motorized use from its junction with trail 33E32 for its entire length. Upon closure, the entire Woodpecker Roadless Area would be free from conflicting uses as a potential Wilderness.

We have recently learned that the Forest Service, in the coming weeks, plans to post the following information related to the wilderness evaluation on its Forest Plan Revision website:

Wilderness Inventory & Evaluation

- Narratives of inventoried polygons with maps
- Spreadsheet that lists polygons being analyzed by alternative
- FAQs to provide context of documents we’re sharing

E-mail from Kevin Elliott to René Voss, dated Nov. 16, 2015. When this information is posted, we strongly encourage the Forest Service to provide a formal public input process, so that we can provide updates, correct errors, and advocate for specific areas for inclusion in the Wilderness recommendations.

2. Specific Potential Wilderness Areas in the Sequoia National Forest and Giant Sequoia National Monument that should be moved forward as Recommended for Wilderness

During the formal process that should occur, as discussed above, we would like to advocate for additional areas not included during the initial recommendations, including additional areas not previously put forward in the Giant Sequoia National Monument.

First, we would like to acknowledge and thank the Forest Service for its recommendation for Wilderness of the Moses Additions to the Golden Trout Wilderness, which occurred through the previous Giant Sequoia National Monument Plan Amendment process. We ask that the recommended Golden Trout Wilderness additions in the form of the Moses areas be acknowledged in this evaluation process and also be specifically carried forward in the preferred alternative in the draft and final EIS.

Also, thank you to Kevin Elliott for clarifying that areas identified for potential wilderness within the Giant Sequoia National Monument or overlapping the Monument boundaries will be evaluated for their wilderness potential during the plan revision process. As we stated in a previous message to Mr. Elliott and in verbal comments to Mike Dietl, given that these areas made it into the inventory and given that they have not been evaluated in their present configuration before, these areas should receive potential wilderness evaluations and narratives with equal weight as the ones in the rest of the Sequoia National Forest now going through the revision process. A wilderness inventory and evaluation was not done during the Monument Plan amendment process because the scope of that process did not include a potential wilderness

inventory and evaluation. And so the Chapter 70 and plan revision rules require that this evaluation process now include the areas within the Monument. We look forward to reviewing the wilderness evaluations and narratives of the areas in the Monument as well as the rest of the Sequoia National Forest.

Based on our decades of study of these areas, Sequoia ForestKeeper and the Kern-Kaweah Chapter of the Sierra Club advocate that the areas listed below meet all of the Wilderness criteria for appearance of naturalness and provide outstanding opportunities for solitude or primitive recreation. The following areas are all untrammeled and undeveloped and should be moved forward as recommended for Wilderness in the preferred alternative of the Draft and Final EIS for the Sequoia National Forest Plan Revision.

Specific Areas that should be recommended by the Forest Service
as Wilderness in the Sequoia National Forest Plan Revision

Boxer Wilderness Bill Areas:

- Woodpecker Roadless Area/Domeland Addition (a part of this area near Sirretta Peak is currently contained in the initial recommendations, titled Domeland West)
- Bright Star Wilderness Additions in Piute Mountains
- Golden Trout Addition (Rattlesnake Creek watershed area, east of the Kern River)

Monument Areas:

- Dennison Mountain (see also FEIS Appx. C for 1988 LRMP) – the area adjacent to SE corner of Sequoia National Park, west of the Moses Additions to the Golden Trout Wilderness
- Slate Mountain – Belknap Camp & south, west of Quaking Aspen
- Black Mountain – south of Hwy 190 to the Tule River Indian Reservation boundary
- Monarch Wilderness Addition – south of the current Wilderness boundary
- Jennie Lakes Wilderness Addition – most of the area north of the Wilderness boundary

Other Areas:

- South Sierra Wilderness Addition – area adjacent to the Golden Trout Wilderness
- South Sierra Wilderness Additions (West) – as proposed by the FS' initial recommendations
- Cannell – east of the Kern River
- Chico (Split Mtn.) – west of the Kern River
- Domeland South Wilderness Addition – west along southern NFS boundary to Kernville
- Oat Mountain – in western-most part of Hume Lake RD, outside the Monument

At this time, we will hold off on providing detailed descriptions, boundary and ecological justifications for these areas. We look forward to responding to the Forest Service's evaluations.

For Sequoia ForestKeeper and the Kern-Kaweah Chapter of the Sierra Club,



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